

State of Ohio	}	
	}	Declaration of Counsel of Raymond V. Vasvari, Jr.
County of Cuyahoga	}	

Raymond V. Vasvari, Jr. , having been duly cautioned, instructed and warned, does hereby depose and testify, under penalty of perjury under the laws of the United States, as follows:

1. My name is Raymond V. Vasvari, Jr., and I am an adult competent to give testimony in a court of law.

2. I am an attorney licensed to practice in and by the State of Ohio and admitted to practice before the United States District Court for the Northern District of Ohio and have been since 1991. I am counsel for the Plaintiffs in the action styled Larry D. Reid, et al. v. Darryl Moore, which is Case Number 1:21-cv-00991 upon the Docket of that Court (“this case”). The information set forth in this Declaration is based upon my personal knowledge.

3. On December 6, 2021, the parties and their attorneys attended court-mandated mediation by video conference. The parties were ordered to memorialize their agreement and to enter a Joint Stipulation of Dismissal with Prejudice no later than 5:00 p.m EST on Monday, December 20, 2021 (ECF No. 27).

4. The parties signed a Settlement Agreement and, through their attorneys, filed the Notice of Joint Stipulation of Dismissal with Prejudice timely on December 20, 2021 (ECF No. 28).

5. The Settlement Agreement was drafted to allow execution in multiple counterparts, and there exist two, substantively identical counterparts, both of which are attached to the Motion to Enforce Settlement Agreement as Exhibits 1 and 2. Exhibit 1 is the counterpart signed Moore and his attorney. Exhibit 2 is the counterpart signed by Reid, Larry Reid Live LLC, and their attorney. A single, non-substantive difference exists between the two counterparts. The signature page of Exhibit 2 was printed from Microsoft Word filed and then appended to a PDF version of the same document for filing. The difference, believed to be cause by formatting difference between the printers, resulted two lines of text at the bottom of Page 5 being repeated on Page 6. The counterparts are substantively identical.

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6. On the evening of December 20, 2021 at or about 7:00 p.m. EST, Darryl Moore posted a new video to YouTube, a transcript of which is attached to a Declaration by Larry D. Reid, which Declaration is also being filed in support of Plaintiffs' Motion to Enforce the Settlement Agreement. It does not appear to remain available on YouTube.

7. On the afternoon and evening of December 21, 2021, I reviewed the Cigar Vlogger channel on YouTube maintained by Darryl Moore. I did so to ascertain whether Moore has complied with the Settlement Agreement in this case, which required him to remove from the Internet all videos that relate or refer to Larry Reid not later than 5:00 p.m. on December 20, 2021.

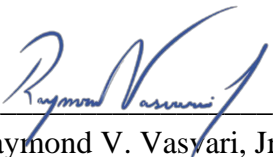
8. Moore has hundreds of videos on YouTube, some several hours long. It was not possible to review them all in a day. To facilitate my review, I looked only for videos I has seen before, and videos that referred to Larry Reid or this litigation in their titles. I found that dozens of videos involving Reid remained online as of 6:30 p.m. on December 20, 2021.

9. In the Memorandum in Support of Plaintiffs' Motion to Enforce the Settlement Agreement being filed in this case, there are listed nineteen examples of such videos. I drafted that Memorandum and that list is based upon what I say online during my review of the Cigar Vlogger YouTube channel. The list reflects the titles, original publication date and URLs for the videos I found to still be online.

10. On the evening of December 21, 2021, the Defendant sent to undersigned counsel several unsolicited emails, one of which was to his attorney but directly copied me. A copy of that email is attached hereto as Declaration Exhibit A. He also live streamed a video on You Tube disparaging Larry Reid and referring to the Settlement Agreement as a "gag order."

**FURTHER DECLARANT SAYETH NAUGHT**

The undersigned, Raymond V. Vasvari, Jr., declares under penalty of perjury under the laws of the United States and pursuant to 28 U.S.C. § 1746 that the foregoing is true to the best of his personal knowledge, in witness whereof he has signed this Declaration below, at Cleveland Heights, Cuyahoga County, Ohio on the 22d Day of December 2021.

  
Raymond V. Vasvari, Jr.

**Subject:** Video evidence that Davyon Augustus alias Consciouz TV worked/still works for Larry Reid...

**Date:** Tuesday, December 21, 2021 at 5:53:03 PM Eastern Standard Time

**From:** Darryl Moore

**To:** Fred Middleton

**CC:** Raymond Vasvari, K. Ann Zimmerman

Attorney Middleton,

Please file a motion immediately, I was asked to do this mediation under false pretenses. Larry Reid is falsely using the courts and his financial backing to squash the truth from being revealed.

The video below was BEFORE the Monday deadline to sign the mediation agreement.

This video is concrete proof that Augustus worked for and still works for Larry Reid...Start at the 3:07 hour mark. He perjured himself when he lied on our Zoom hearing September 2021 when he said that Consciouz TV did not work for him. This video from two days ago proves he lied. Augustus brags in this video about "kicking my ass" for Larry and helping him with the case. Reid thanks him for his work. The judge and magistrate need to see this immediately. I have downloaded this video. They will try to hide this video. I think this mediation should be null and void. During Larry Reid's deposition in the Jon Kelcey Stephens

 [LarryReid\\_LinkPDF.pdf](#)

 [LarryReid\\_PDFTran.pdf](#)

case (where he is being sued for slander/defamation in Georgia), he pretended that he barely knew Augustus but that is a lie. Under penalty of perjury in that case, he lied. I have the OFFICIAL copy of the transcript from that deposition to prove he said he didn't know Augustus. He has been working with Augustus all along. This man is a liar that must be stopped! He wanted to squash the story from the three accusers about his allegations of child molestation and infecting one of them with HIV. He also wanted to hide the \$70,900 in loan money that he illegally obtained. He knows I have the date, time, email address, address that he used to get the funds.

Since Augustus works for Reid, all of his content about Reid and myself should also be ordered to be taken down from all social media accounts.

Augustus should be bound to never discuss Reid or myself. He is a party to this action since he is in the employ of Larry Reid. Reid used him (per this video) to assist him in the handling of the case involving Reid and myself as his employee.

ATTACHED...Deposition from Jon Kelcey Stephens

## Dec 20th 5pm Est The End Of Darryl Moore - Mookie & His Death Bed - New Gag Orders

<https://youtu.be/rnVd5V3g5Ks>

Thank you,  
Darryl D. Moore  
(424) 237-5550 mobile  
<http://www.moore-ent.com>



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